

Amendments to the Drawings

Please enter into the application the accompanying NEW drawings sheet containing FIG. 1.

Remarks

In view of the foregoing amendments and the following remarks, reconsideration of the outstanding office action is respectfully requested.

Claims 1 and 3 have been amended, and new claim 11 has been introduced. No excess claim fees are due with this submission.

The amendments to claim 1 are supported by the disclosure at page 5, line 7 to page 6, line 10, and page 9, lines 11-20. In view of the remarks at page 2 of the office action, the non-limiting parenthetical content illustrating interleaved program and schedule data has been deleted from the claim language. New claim 11 is supported by the same disclosure noted above. Therefore, no new matter is introduced by this amendment.

The objection to the specification for absence of a drawing is overcome by the drawing sheet (containing Figure 1) submitted herewith. Figure 1 illustrates the order of transmission for interleaved program/schedule EPG data as illustrated at pages 5-6 of the application as filed. Therefore, no new data is introduced by the new figure and the amendments to the specification to reference the figure.

The rejection of claims 1-5, 7, 8, and 10 under 35 U.S.C. § 103(a) for obviousness over U.S. Application Publ. No. US2006/0092052 to Baldwin *et al.* ("Baldwin") in view of U.S. Patent No. 5,844,620 to Coleman *et al.* ("Coleman") is respectfully traversed.

Baldwin discloses a method that allows a server to generate compressed program data for an EPG so that it can be readily stored and searched on a user's set top box, which has limited memory availability. The server constructs a code table that assigns code from a standard code set that are normally unused to frequently occurring character pairs in the EPG data, which allows compression of the data. Identifiers are inserted into the compressed data strings to separate sub-strings and this data is sent to the set top box. To search the compressed data at the set top box, the search query is compressed and compared against the compressed EPG data. When a match is found in the substring, the data is decompressed by replacing code in the compressed substring with the corresponding character pairs in the code table.

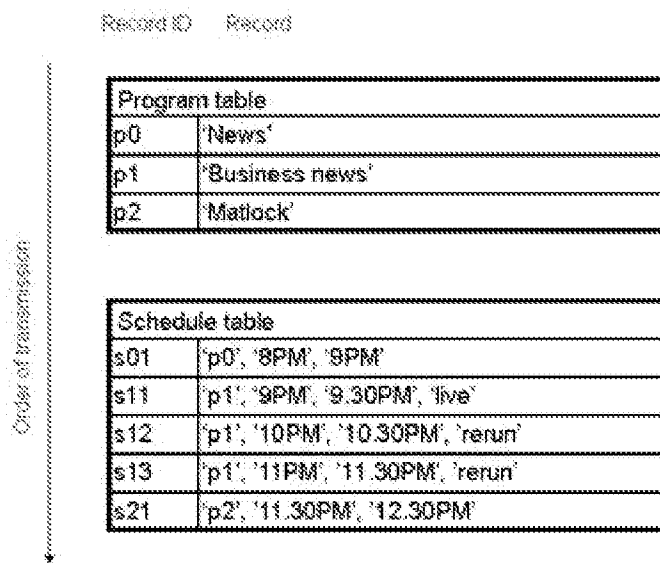
Although Baldwin discloses sending time related program data (i.e., associated with a specific time period), there is no disclosure of interleaving and sending all schedule data associated with a particular program to an EPG. In addition, Baldwin actually teaches at col. 9, lines 42 to col. 10, line 15 of storing program and scheduling data *separately* and *not in a*

combined coding manner as in the present application. Indeed, Baldwin describes separate program tables and separate schedule tables (*see* Figure 6). Baldwin actually states at col. 9, lines 59-61 that “[e]ach schedule record 628 has one or more fields, such as a time field 630 and a program identifier field 632.” This statement confirms that Baldwin provides the same teaching as the prior art set out in the background of the present application at pages 1-2.

Thus, Baldwin teaches a skilled person away from combining program and scheduling data together to save memory space and is merely doing what has already been set out as the prior art in the preamble of the present application.

Although Baldwin describes cross-indexing of data between tables at col. 10, lines 4-15 (*see* Figure 6), Baldwin does not disclose the transmission of *individual* records, or that the program records and schedule records are transmitted in an *interleaved* manner as claimed.

A graphical representation of Baldwin, for comparison with new Figure 1, is presented below:

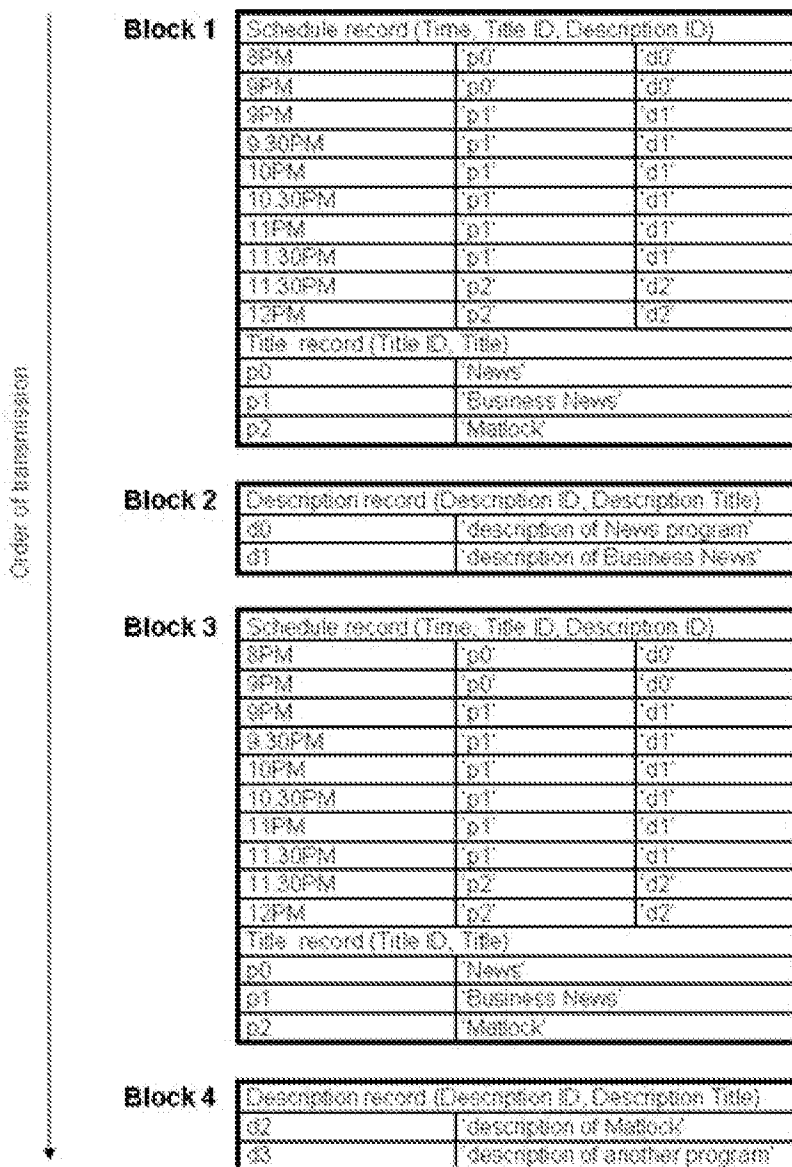


The problem with the system of Baldwin (and as described on page 1, line 17 to page 2, line 16) is that if the transmission is interrupted before the schedule table is received, while the program information may be available, it is impossible to create an EPG as none of the schedule information would be available.

Coleman teaches that schedule records are transmitted in N blocks (one block per time slot, each block containing multiple title record IDs and description record IDs (col. 14, line 66 to col. 15, line 3). Each of the N blocks also contains *all* title and description information for

the programs in that particular time slot (col. 15, lines 3-32). The time slots are up to 168 hours (7 days) in length (col. 11, lines 23-35). Coleman describes how the transmission of schedule/title blocks may be *repeated*, and when doing so the description blocks are transmitted at a lower rate. Coleman also makes clear that in transmitting description blocks, half of the descriptions are transmitted in one block and the remaining half of the description are transmitted in a separate block.

A graphical representation of Coleman, for comparison with new Figure 1, is provided below:



As each block relates to multiple programs in a timeslot (4 hours in this example), and the titles are held in a different block from the schedule record, it is clear that the schedules are *not* interleaved with the titles. Indeed, as multiple descriptions are provided in each description block (i.e., each of two description blocks contains roughly half of all descriptions), the records therein are not separated by schedule records. Moreover, title records for two particular programs also are not separated by all schedule records for one of those programs (*see* each of Blocks 1 and 3 in the graphical representation above).

The problem with this system of Coleman is that, again, if the transmission is interrupted before Block 1 is fully received, the EPG would be impossible to create as although the schedule information would be available, there would be no title or description information.

In contrast, the claimed invention interleaves individual program records with the corresponding individual schedule records (i.e., one or more schedule records), so that the program data is always closely accompanied by the relevant schedule data. Advantageously, if the transmission is interrupted, an EPG can still be created based on the data received up to that point.

Neither Baldwin nor Coleman teaches the problem or solution of the present invention, and the combination of Baldwin and Coleman would not have suggested the present invention to a person of ordinary skill. A skilled person considering the combined teachings of Baldwin and Coleman would not have found the present invention obvious, because there is no indication in either reference of the problem being solved by the present invention or of the solution.

Thus, the combination of Baldwin and Coleman is deficient in teaching or suggesting “the program records and the schedule records being coded and/or transmitted in an interleaved manner such that two successive program records are separated by one or more schedule records associated with one of the two successive program records...wherein each program record and its associated schedule records are received *prior to the next program record being received*” (emphasis introduced). As a consequence of this coding and/or transmitting, “at a receiving device comprising a processor and a memory, the EPG data is read, parsed and stored in the memory as it is being received before the complete reception of the data for the EPG is finished.” These features of the claimed invention are not suggested by the art of record.

For these reasons, the rejection of claims 1-5, 7, 8, and 10 for obviousness over Baldwin in view of Coleman is improper and should be withdrawn.

For substantially the same reasons noted above, applicants submit that new claim 11 is also allowable over the combination of Baldwin and Coleman. In particular, the combination of Baldwin and Coleman fails to teach or suggest “transmitting EPG data...wherein the program records and schedule records are interleaved such that two successive program records are separated by one or more schedule records associated with one of the two successive program records, and receiving the EPG data at a receiving device ... wherein each program record and its associated schedule records are received prior to the next program and its associated schedule records being received.”

This submission is accompanied by a petition for three-month extension of time. All fees associated therewith should be charged to deposit account 14-1138. Any overpayment/underpayment should be credited/charged to this same account.

In view of all the foregoing, it is submitted that this case is in condition for allowance and such allowance is earnestly solicited.

Respectfully submitted,

Date: November 5, 2010

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